

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re:)	Chapter 7
)	
JTR1, LLC, f/d/b/a JTR, LLC,)	Case No. 20-30141
)	
)	
Debtor.)	
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)	
A. Burton Shuford, Trustee of the)	
Bankruptcy Estate of JTR1, LLC,)	
f/d/b/a JTR, LLC,)	
)	
Plaintiff,)	
)	Adv. Proc. No. 22-03018
v.)	
)	
BJS Insurance, LLC, and)	
JJM, LLC,)	
)	
Defendants.)	
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NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

Pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure, notice is hereby given of the appearance of the law firm of K&L Gates LLP, by and through John R. Gardner, as counsel of record for BJS Insurance, LLC and JJM, LLC (each, a “Defendant,” and together, the “Defendants”) in the above-captioned adversary proceeding (the “Adversary Proceeding”).

Request is hereby made that the undersigned counsel be added to the mailing list maintained by the Clerk, and that all notices given or required to be given in this Adversary Proceeding, and all pleadings and other papers served, or required to be served, in this Adversary Proceeding, be given to and served upon the following:

K&L Gates LLP
Attn: John R. Gardner
Post Office Box 17047 (27619-7047)
4350 Lassiter at North Hills Ave., Suite 300
Raleigh, North Carolina 27609
Telephone: (919) 743-7325
Facsimile: (919) 516-2124
E-mail: John.Gardner@klgates.com

PLEASE TAKE FURTHER NOTICE THAT, this Notice of Appearance and Request for Notices shall not be deemed to be or construed as a waiver of either Defendant's rights: (a) to have final orders in non-core matters entered only after de novo review by a District Judge; (b) to trial by jury in any proceeding so triable in this Adversary Proceeding; or (c) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal. This Notice of Appearance and Request Notices is likewise not a waiver of any other rights, claims, actions or setoffs to which each Defendant is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses and setoffs each Defendant expressly reserves.

This is the 28th day of March, 2022.

K&L GATES, LLP

/s/ John R. Gardner

John R. Gardner
North Carolina State Bar No. 32683
K&L Gates LLP
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Counsel for BJS Insurance, LLC and JJM, LLC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Notice of Appearance and Request for Notices was filed electronically in accordance with the local rules and was therefore served electronically on those entities that have properly registered for electronic service.

Dated: March 28, 2022

/s/ John R. Gardner

John R. Gardner